

Exhibit 13

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

---o0o---

In Re: CATHODE RAY TUBE (CRT))
ANTITRUST LITIGATION,)
)
Plaintiff,)

Case No.
07-5944 Sc
MDL No. 1917

_____)
This Document Relates to:)
)
ALL ACTIONS,)
_____)

VIDEOTAPED DEPOSITION OF BARRY KUSHNER
FRIDAY, MARCH 2, 2012

REPORTER: BALINDA DUNLAP, CSR 10710, RPR, CRR, RMR

1 Q. Mr. Kushner, in your own words, please
2 describe the claim or claims that you are asserting
3 in this case.

4 A. I'm asserting that due to price-fixing, I
09:02 5 actually paid more for my CRT TVs than I should
6 have paid.

7 Q. What is a cathode ray tube?

8 A. CRT, cathode ray tube.

9 Q. Do you know anything about a CRT other
09:02 10 than its name?

11 A. No.

12 Q. Okay. Throughout this deposition, I am
13 going to refer to cathode ray tubes, as you did, as
14 CRTs, okay?

09:03 15 A. Fine.

16 Q. What type of products contain CRTs?

17 A. Televisions, computer monitors.

18 Q. Anything else?

19 A. Not to my knowledge. I am sure there are.

09:03 20 Q. Have you ever personally purchased a CRT?

21 A. Well, yes.

22 Q. Let me clarify. Have you ever personally
23 purchased a CRT standing alone?

24 A. No.

09:03 25 Q. Have you ever personally purchased a

1 Toshiba television was manufactured by someone
2 other than a defendant or an alleged coconspirator?

3 MR. GRALEWSKI: Object to the form of the
4 question. Calls for speculation. Lacks
09:41 5 foundation.

6 THE WITNESS: Possible.

7 Q. BY MS. DONOVAN: Do you know the price
8 that Toshiba paid for the CRT inside your
9 television?

09:42 10 A. No.

11 Q. Do you know where the CRT inside your
12 television was manufactured?

13 A. No.

14 Q. Do you know where the Toshiba television
09:42 15 was manufactured?

16 A. No.

17 Q. And do you know where Toshiba obtained the
18 CRT inside your television?

19 A. No.

09:42 20 Q. And if asked by your counsel, would you be
21 willing to open your television to determine if it
22 contains a CRT manufactured by a defendant in this
23 case and/or to determine the size of the CRT
24 contained in your television?

09:42 25 A. Yes.